

1 HEATHER E. WILLIAMS, SBN 122664  
Federal Defender  
2 HOOTAN BAIGMOHAMMADI, SBN 279105  
Assistant Federal Defender  
3 Designated Counsel for Service  
801 I Street, Third Floor  
4 Sacramento, CA 95814  
T: (916) 498-5700  
5 F: (916) 498-5710  
  
6 Attorneys for Defendant  
Mr. Hooton  
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8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA, ) Case No. 2:21-cr-105-TLN  
11 )  
Plaintiff, ) **STIPULATION AND ORDER TO CONTINUE**  
12 ) **STATUS CONFERENCE AND EXCLUDE TIME**  
vs. )  
13 ) Date: December 2, 2021  
BRENT EDWARD HOOTON, ) Time: 9:30 a.m.  
14 ) Judge: Hon. Troy L. Nunley  
Defendant. )  
15 \_\_\_\_\_)

16 IT IS HEREBY STIPULATED and agreed by and between Acting United States  
17 Attorney Phillip A. Talbert, through Assistant United States Attorney Mira Chernick, counsel for  
18 Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan  
19 Baigmohammadi, counsel for Defendant Brent Edward Hooton, that the status hearing currently  
20 set for December 2, 2021 at 9:30 be continued to January 27, 2022 at 9:30 a.m.

21 The parties specifically stipulate as follows:

- 22 1. By previous order, this matter was set for a status on December 2, 2021 at 9:30 a.m.  
23 2. Mr. Hooton now moves to continue the status conference to January 27, 2022 at 9:30  
24 a.m.  
25 3. The government has discovered over 600 pages and various video and audio recordings  
26 to the defense. The government has also made available to the defense the seized  
27 electronic devices in this case for inspection.  
28

4. The defense requires additional time to review the discovery; investigate and research possible defenses; research potential pretrial motions; consult with Mr. Hooton; explore potential resolutions to the case; and otherwise prepare for trial.
5. Defense counsel believes that failure to grant the requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See* U.S.C. § 3161(h)(7)(B)(iv).
6. The government does not object to the continuance.
7. The parties jointly request the Court to find that the ends of justice served by granting the continuance outweighs the best interest of the public and Mr. Hooton in a speedy trial; and for the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), that the time period between December 2, 2021 and January 27, 2022, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A) (Local Code T4).

Respectfully submitted,

HEATHER E. WILLIAMS  
Federal Defender

Date: November 29, 2021

/s/ Hootan Baigmohammadi  
HOOTAN BAIGMOHAMMADI  
Assistant Federal Defender  
Attorneys for Defendant  
Mr. Hooton

Date: November 29, 2021

PHILLIP A. TALBERT  
Acting United States Attorney

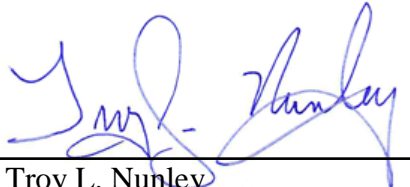
/s/ Mira Chernick  
Mira Chernick  
Assistant United States Attorney  
Attorneys for Plaintiff

**ORDER**

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: November 30, 2021

  
\_\_\_\_\_  
Troy L. Nunley  
United States District Judge